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United States District Court
Southern District of Texas
FILED
JAN 2 3 2014
David J. Bradley, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	**CRIMINAL NO. H-14-10-S**
	§	
JAMES VAN-GERALD JOHNSON,	§	
DEZMOND LACRAIG EDWARDS,	§	
RONALD DEAN RICHARDS, and	§	**Under Seal**
ALLEN BERNARD ROUNDTREE	§	
aka Lil B	§	

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

1. At all times material to this Indictment, Loomis Armored US Inc., maintains offices throughout the United States and was engaged in the business of secured armored transport of United States currency in interstate commerce and in picking up and delivering United States currency to financial institutions and check cashing businesses, both of which are industries which affect interstate commerce.

COUNT ONE
(Conspiracy to Interfere with Commerce by Robbery)

2. From on or about October 1, 2013, through on or about December 31, 2013, in the Houston Division of the Southern District of Texas, the defendants,

**JAMES VAN-GERALD JOHNSON,
DEZMOND LACRAIG EDWARDS,
RONALD DEAN RICHARDS, and
ALLEN BERNARD ROUNDTREE aka Lil B**

did knowingly and intentionally combine, conspire, confederate, and agree with each other, to obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, Sections 1951(b)(1) and (b)(3), in that the defendants did unlawfully combine, conspire, confederate, and agree with each other, to unlawfully take and obtain property, namely, United States currency, which was in the possession and custody of an employee of Loomis Armored US Inc, by means of actual and threatened force, violence, and fear of injury to said individual or individuals; in violation of Title 18, United States Code, Section 1951(a).

MANNER AND MEANS

The unlawful conspiracy was accomplished in the following manner and means:

1. It was part of the conspiracy that **JAMES VAN-GERALD JOHNSON, DEZMOND LACRAIG EDWARDS, RONALD DEAN RICHARDS, and ALLEN BERNARD ROUNDTREE** discussed a plan to rob an armored car.

2. It was further part of the conspiracy that **RONALD DEAN RICHARDS and ALLEN BERNARD ROUNDTREE** would drive different vehicles and leave them at a location close to the robbery.

3. It was further part of the conspiracy that **JAMES VAN-GERALD JOHNSON** would be armed with a pistol.

4. It was further part of the conspiracy that **JAMES VAN-GERALD JOHNSON** would take the armored van and drive it to a nearby parking garage.

5. It was further part of the conspiracy that after **JAMES VAN-GERALD JOHNSON**, had control over the armored van, he would follow a stolen vehicle, i.e. a red pickup truck, to a nearby parking garage.

6. It was further part of the conspiracy that in the parking garage **JAMES VAN-GERALD JOHNSON** and **RONALD DEAN RICHARDS** would transfer the money from the Loomis van into the red pickup truck.

7. It was further part of the conspiracy that **JAMES VAN-GERALD JOHNSON** and

RONALD DEAN RICHARDS would then leave the armored van in the parking garage and drive in the red pickup truck to a nearby parking lot next to Planned Parenthood.

8. It was further part of the conspiracy that **ALLEN BERNARD ROUNDTREE** would be waiting in the nearby parking lot next to Planned Parenthood.

9. It was further part of the conspiracy that in the parking lot **JAMES VAN-GERALD JOHNSON, RONALD DEAN RICHARDS, and ALLEN BERNARD ROUNDTREE** would transfer the money out of the red pickup truck and into a white Escalade and black pickup truck.

10. It was further part of the conspiracy that **JAMES VAN-GERALD JOHNSON, DEZMOND LACRAIG EDWARDS, RONALD DEAN RICHARDS, and ALLEN BERNARD ROUNDTREE** would split the proceeds from the robbery.

OVERT ACTS

In furtherance of this conspiracy, and in order to effect and accomplish its objectives, one or more of the defendants committed the following overt acts in the Southern District of Texas:

1. On or about December 5, 2013, **JAMES VAN-GERALD JOHNSON, RONALD DEAN RICHARDS, and ALLEN BERNARD ROUNDTREE** did a test run of the route by driving by the University of Houston student center, the nearby parking garage, and the parking lot next to Planned Parenthood.

2. On or about December 6, 2013, **JAMES VAN-GERALD JOHNSON, RONALD DEAN RICHARDS, and ALLEN BERNARD ROUNDTREE** drove to the University of Houston campus.

3. On or about December 6, 2013, **JAMES VAN-GERALD JOHNSON** and **ALLEN BERNARD ROUNDTREE** waited for the armored van to arrive in front of the

University of Houston Student Center.

4. On or about December 6, 2013, **JAMES VAN-GERALD JOHNSON,** was armed with a pistol, approached the armored car driver, threatened her with the pistol and demanded that she give him the armored car.

5. On or about December 6, 2013, **JAMES VAN-GERALD JOHNSON** drove away in the armored van.

6. On or about December 6, 2013, **JAMES VAN-GERALD JOHNSON** followed the red pickup truck driven by **RONALD DEAN RICHARDS** to a nearby parking garage.

7. On or about December 6, 2013, **JAMES VAN-GERALD JOHNSON and RONALD DEAN RICHARDS** loaded the money from the armored van into the red pickup truck.

8. On or about December 6, 2013, **ALLEN BERNARD ROUNDTREE** circled around the parking garage in the white Escalade.

9. On or about December 6, 2013, **JAMES VAN-GERALD JOHNSON and RONALD DEAN RICHARDS** drove the red pickup truck, and followed **ALLEN BERNARD ROUNDTREE** to the parking lot next to Planned Parenthood.

10. On or about December 6, 2013, **JAMES VAN-GERALD JOHNSON, RONALD DEAN RICHARDS, and ALLEN BERNARD ROUNDTREE** transferred the money from the red pickup truck into the white Escalade and black pickup truck.

11. On or about December 6, 2013 **JAMES VAN-GERALD JOHNSON, RONALD DEAN RICHARDS, and ALLEN BERNARD ROUNDTREE** abandoned the red pickup truck in the parking lot next to Planned Parenthood.

12. On or about December 6, 2013, **JAMES VAN-GERALD JOHNSON, RONALD DEAN RICHARDS, and ALLEN BERNARD ROUNDTREE** went to **ALLEN BERNARD ROUNDTREE'S** mother's home, in Houston, TX and divided the

money.

13. On or about December 14, 2013, **JAMES VAN-GERALD JOHNSON** met with **DEZMOND LACRAIG EDWARDS** and paid him $40K for his role in the conspiracy.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO
(Interference with Commerce by Robbery)

On or about December 6, 2013, in the Houston Division of the Southern District of Texas, the defendants,

JAMES VAN-GERALD JOHNSON,
DEZMOND LACRAIG EDWARDS,
RONALD DEAN RICHARDS, and
ALLEN BERNARD ROUNDTREE aka Lil B

did aid, abet and assist each other and did knowingly obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, Sections 1951(b)(1) and (b)(3), in that the defendants did unlawfully take and obtain property, namely, United States currency, which was in the possession and custody of an employee of Loomis Armored US Inc., by means of actual and threatened force, violence, and fear of injury to said individual or individuals.

In violation of Title 18, United States Code, Section 1951(a) and 2.

COUNT THREE
(Brandishing a Firearm During a Crime of Violence)

On or about December 6, 2013, in the Southern District of Texas,

JAMES VAN-GERALD JOHNSON

defendant herein, did knowingly use and carry a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, as set forth in Counts One and Two of this indictment, in violation of Title 18, United States Code, Section 1951(a), and in committing the violation, the defendant did brandish said firearm.

In violation of Title 18, United States Code, section 924(c)(1)(A)(ii).

NOTICE OF CRIMINAL FORFEITURE

Pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the United States of America hereby gives notice that upon conviction of Brandishing a Firearm During a Crime of Violence, as charged in Count Three, all firearms and ammunition involved in or used in such offense are subject to forfeiture, including but not limited to: Smith and Wesson, model SW40VE, .40 caliber pistol.

NOTICE OF CRIMINAL FORFEITURE

Pursuant to Title 28, United States Code, Section 2461 (c), and Title 18, United States Code, Section 981 (a)(1)(C), the United States of America gives notice that upon conviction of Interference with Commerce by Robbery or a conspiracy to do so as charged in Counts One and Two, the United States intends to seek forfeiture of all property, real or personal, which constitutes or is derived from proceeds traceable to such offenses, including, but not limited to $4,145,960.00 in U.S. currency.

MONEY JUDGEMENT

The Defendants are notified that upon their conviction, a money judgement may be imposed equal to the total value of the property subject to forfeiture, for which the Defendants may be jointly and severally liable.

SUBSTITUTE PROPERTY

In the event that any of the property subject to forfeiture as a result of any act or omission of a defendant:

a. cannot be located upon exercise of due diligence;

b. has been placed beyond the jurisdiction of the Court;

c. has been transferred or sold to, or deposited with a third party;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of such property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL:

Original Signature on File

FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON
United States Attorney

By: [signature]
Megan J. Paulson
Assistant United States Attorney